

June 12, 2002

Defense Acquisition Regulations Council
OUSD (AT&L)DP(DAR), IMD 3C132
3062 Defense Pentagon
Washington, D.C. 20301-3062

Attention: Ms. Susan L. Schneider

**Re. DFARS Case 2001-D017; Competition Requirements for
Purchase of Services Under Multiple Award Contracts**

I am writing on behalf of the Presidents of six leading not-for-profit professional services firms indicated below who provide significant support to the Federal Government and are vitally interested in the objectives of your proposed amendments to DFARS in satisfaction of Section 803 of the FY2002 National Defense Authorization Act.

We fully subscribe to the goal of increasing competition for purchase of services under Multiple Award Contracts. As service providers for such awards, we are very familiar with how they are being made today. We further feel the Federal Government has made substantial progress in assuring competitive, qualified proposals through the GSA Schedule. The GSA Schedule process has provided a cost and technically competitive basis for numerous task order awards and BPA's. The proposed DFAR changes are clearly intended to continue to achieve the desired goal, but we feel some adjustments are merited. We will not attempt to provide detailed language, but indicate where we feel an altered focus would better achieve the results we all desire.

The principle of fair notice is certainly required for competition. While we agree that a definition of the term is not necessary, we believe that the rule should provide examples of "fair notice," such as use of a standard website such as FedBizOpps as satisfying such notice.

The statement "as many contractors as practicable" should be implemented in such a way that a contracting officer can apply reasonable market analysis to determine the practicable number, and then document that effort. Arbitrary numbers of solicitations or even bids do not satisfy the requirement. Training in and implementation of acquisition planning by the contracting officers will be a major positive step in properly implementing this requirement.

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Finally, the guidance provided by DoD to its acquisition workforce should be clear and should empower that workforce to implement a procurement process that is efficient and timely and utilizes best value as the selection criteria in support of competition.

We appreciate your interest in our comments, and would be pleased to provide more input if desired.

Respectfully submitted,

ALTARUM

A handwritten signature in black ink, appearing to read 'KRB', followed by a long horizontal line extending to the right.

Kenneth R. Baker
President

ADVANCED TECHNOLOGY INSTITUTE
Robert G. Kiggans, President and CEO

HOUSTON ADVANCED RESEARCH CENTER
J. Todd Mitchell, President

RTI
Victoria Franchetti Haynes, President

SOUTH CAROLINA RESEARCH AUTHORITY
Larry E. Druffel, President and CEO

SYRACUSE RESEARCH CORPORATION
Robert U. Roberts, President and CEO